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THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER, Plaintiff, v. JOSHUA MOON, <i>et al.</i> Defendants.	DEFENDANTS' NOTICE OF SUPPLEMENTAL AUTHORITY Case No. 2:24-cv-00421-DBB District Judge David Barlow Magistrate Judge Jared C. Bennett
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NOW COME Defendants Joshua Moon and Lolcow, LLC, by and through their undersigned counsel, and file this Notice of Supplemental Authority regarding Mr. Greer's continued frivolous and vexatious threats to report undersigned counsel to the Virginia State Bar.

As Defendants first pointed out at ECF No. 239, Mr. Greer's pattern is to threaten to report opposing counsel to bar disciplinary authorities if they do not accede to his demands or for retaliatory purposes. Indeed, threatening undersigned counsel with a bar complaint was Mr. Greer's first reaction when a Motion for Sanctions was filed against Mr. Greer relating to false statements Mr. Greer made to the predecessor court in the Northern District of Florida. ECF No. 252 at 1-2. And Mr. Greer has also filed litigation in which he specifically seeks the disbarment of a Nevada lawyer after that lawyer refused to accede to Mr. Greer's threats. ECF No. 252-2.

Mr. Greer's pattern of threatening bar complaints when his narrative is challenged has continued today, in a strikingly similar context. When Mr. Greer became aware that Defendants were investigating the Plaintiff's assertions regarding an "emergency" which supposedly came up on May 6, 2025 and required Mr. Greer to seek to postpone this Court's motions hearing at the last minute,¹ ECF No. 285, the Plaintiff's immediate response was to once again threaten undersigned counsel with a bar complaint. Exhibit A. Additionally, Mr. Greer "upped the ante" by accusing undersigned counsel's client of being involved with "bomb threats and pedophilia." *Id.* Mr. Greer once again admitted that the true purpose of this litigation is not to vindicate any supposed copyright or address any infringement, but to get discussion of Mr. Greer and his behaviors "off of kiwi farms." *Id.*

WHEREFORE, Defendants respectfully submit that Mr. Greer continues to illustrate why sanctions are necessary to ensure that Mr. Greer is not abusing the resources of this Court for improper purposes. Additionally, Defendants submit that Mr. Greer has revealed this litigation was filed and is being maintained for an improper and non-copyright related purpose.

DATED May 12, 2025

HARDIN LAW OFFICE

/s/ Matthew D. Hardin

Matthew D. Hardin

Attorney for Defendants Joshua Moon and
Lolcow, LLC

¹ On information and belief, there was no "emergency" on May 6, 2025, and Mr. Greer's assertions to the contrary at ECF No. 277 were false or fraudulent for the reasons explained at ECF No. 285 at 2, n. 2. Cf. 285-3 at 2 (agenda indicating Mr. Greer requested to speak at regularly scheduled Winnemucca City Council meeting to request rezoning of a hotel for purposes of establishing a brothel).